

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIE RAYMOND REVOCABLE TRUST,
on Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

MAT FIVE LLC, CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP FIXED INCOME
ALTERNATIVES, CITIGROUP GLOBAL
MARKETS INC. and REAZ ISLAM,

Defendants.

ALICE LILLEGARD and ROBERT
LILLEGARD, on Behalf of Themselves and
All Others Similarly Situated,

Plaintiffs,

v.

MAT FIVE LLC, CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP FIXED INCOME
ALTERNATIVES, CITIGROUP GLOBAL
MARKETS INC. and REAZ ISLAM,

Defendants.

Civil Action No. 08 CIV 4152 NRB

CLASS ACTION

**NOTICE OF MOTION BY CLASS
MEMBERS MICHAEL JOEL STONE
REVOCABLE TRUST AND ALBECO,
INC., FOR THE CONSOLIDATION OF
ALL RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF,
AND FOR APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF LEAD
COUNSEL**

Civil Action No. 08 CIV 5641-UA

PLEASE TAKE NOTICE that, pursuant to Section 27(a)(3)(B) of the Securities Act of 1933, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), class member Michael Joel Stone Revocable Trust, and Albeco, Inc. (together “the Stones”) hereby move this Court at the United States District Court for the Southern District of New York, at a date and time to be determined by the Court, for an Order: (i) consolidating all related cases and any subsequently filed related cases, (ii) appointing Michael Joel Stone Revocable Trust and Albeco, Inc., on behalf of the class as Lead Plaintiff in the above action and any subsequently filed related cases; and (iii) approving the selection of Hulett Harper Stewart LLP as Lead Counsel and The Rosen Law Firm, P.A., as Liaison Counsel.

This Motion is based on the accompanying Memorandum of Law, the Declaration of Phillip Kim, and all prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

DATED: June 30, 2008
New York, New York

THE ROSEN LAW FIRM, P.A.
LAURENCE M. ROSEN, ESQ. (LR 5733)
PHILLIP KIM, ESQ. (PK 9384)

/s/ Phillip Kim
PHILLIP KIM, ESQ.

350 Fifth Avenue, Suite 5508
New York, NY 10118
Telephone: (212) 686-1060
Facsimile: (212) 202-3827

HULETT HARPER STEWART LLP
KIRK B. HULETT (KBH 2281)
550 West C Street, Suite 1600
San Diego, CA 92101
Telephone: (619) 338-1133
Facsimile: (619) 338-1139

Attorneys for Proposed Lead Counsel for Movant
Michael Joel Stone Revocable Trust and Albeco,
Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this on the 30th day of June 2008, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARIE RAYMOND REVOCABLE TRUST,
on Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

MAT FIVE LLC, CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP FIXED INCOME
ALTERNATIVES, CITIGROUP GLOBAL
MARKETS INC. and REAZ ISLAM,

Defendants.

Civil Action No. 08 CIV 4152 NRB

CLASS ACTION

**[PROPOSED] ORDER FOR THE
CONSOLIDATION OF ALL RELATED
ACTIONS, APPOINTMENT OF LEAD
PLAINTIFF, AND APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF LEAD
COUNSEL**

ALICE LILLEGARD and ROBERT
LILLEGARD, on Behalf of Themselves and
All Others Similarly Situated,

Plaintiffs,

v.

MAT FIVE LLC, CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP FIXED INCOME
ALTERNATIVES, CITIGROUP GLOBAL
MARKETS INC. and REAZ ISLAM,

Defendants.

Civil Action No. 08 CIV 5641-UA

Upon good cause shown and all of the records and proceedings herein,

IT IS HEREBY ORDERED THAT:

I. CONSOLIDATION

The above-captioned actions and any subsequently filed related actions are appropriate for consolidation and are consolidated for all purposes including, but not limited to, discovery, pre-trial proceedings and trial proceedings, pursuant to Rule 42(c) of the Federal Rules of Civil Procedure. This matter shall be identified as: *In MAT Five Securities Litigation*, Case No.: 08-civ-4152 NRB, and the files of the action shall be maintained in one file under Master File No. 08-civ-4152 NRB.

II. APPOINTMENT OF LEAD PLAINTIFF

The Michael Joel Stone Revocable Trust and Albeco, Inc., are hereby appointed the Lead Plaintiff in the action pursuant to Section (3)(B) of the 1933 Act, 15 U.S.C. § 77(z)-1(a)(3)(B).

III. PLAINTIFF'S COUNSEL

Lead Plaintiff's selection of the law firm of Hulett Harper Stewart LLP as Plaintiff's Lead Counsel and The Rosen Law Firm, P.A. as liaison counsel in this action is approved.

Lead counsel is hereby vested by the Court with the following responsibilities and duties in connection with this action:

1. To direct and coordinate the briefing and arguing of motions;
2. To direct and coordinate the initiation and conduct of discovery proceedings, including, but not limited to, requests for production of documents, written interrogatories, requests for admissions, depositions and/or third party subpoenas;
3. To direct and coordinate the examination of witnesses in depositions and on oral interrogatories;
4. To act as spokespersons at pretrial conferences;

5. To direct the preparation for a trial of this matter and to delegate work responsibilities to selected counsel as may be required in such a manner as to lead to the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort;

6. To direct and coordinate the conduct of pre-trial, trial and post-trial proceedings;

7. To consult with and employ experts;

8. To initiate and conduct all settlement negotiations with counsel for Defendants;
and

9. To perform such other duties as may be expressly authorized by further order of the Court.

No motion, request for discovery, or other pre-trial proceedings shall be initiated or filed by any plaintiff except through Plaintiff's Lead Counsel.

Defendants' counsel may rely upon all agreements made with Plaintiff's Lead Counsel, and such, agreements shall be binding on all plaintiffs in this action.

Plaintiff's Lead Counsel is hereby designated as the counsel for plaintiffs upon whom all notices, orders, pleadings, motions discovery, and memoranda may be served and defendants shall effect service of papers on plaintiffs by serving Plaintiff's Lead Counsel. Plaintiff's Lead Counsel is authorized to receive orders, notices, correspondence and telephone calls from the Court and the Clerk of the Court on behalf of all plaintiffs.

If Defendants file a single pleading or other paper directed to all plaintiffs in this action, the response on behalf of plaintiffs shall be made in a single pleading or other paper to be served by Plaintiff's Lead Counsel. All plaintiffs in this action shall be bound by that pleading or paper.

SO ORDERED, this ____ day of _____, 2008

HONORABLE NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Submitted by:

THE ROSEN LAW FIRM, P.A.
LAURENCE M. ROSEN, ESQ. (LR 5733)
PHILLIP KIM, ESQ. (PK 9384)

/s/ Phillip Kim
PHILLIP KIM, ESQ.

350 Fifth Avenue, Suite 5508
New York, NY 10118
Telephone: (212) 686-1060
Facsimile: (212) 202-3827

HULETT HARPER STEWART LLP
KIRK B. HULETT (KBH 2281)
550 West C Street, Suite 1600
San Diego, CA 92101
Telephone: (619) 338-1133
Facsimile: (619) 338-1139

Attorneys for Proposed Lead Counsel for
Movant Michael Joel Stone Revocable Trust
and Albeco, Inc.